

1 Damion D. D. Robinson, Cal. Bar No. 262573  
dr@robinsonmarkevitch.com  
2 David Markevitch, Cal. Bar No. 256163  
dm@robinsonmarkevitch.com  
3 Jimmie Davis Parker Cal. Bar No. 252023  
jdp@robinsonmarkevitch.com  
4 ROBINSON MARKEVITCH & PARKER LLP  
5 8430 Santa Monica Blvd., Suite 200  
West Hollywood, CA 90069  
6 Tel. (213) 757-7778

7 Raymond P. Boucher, Cal. Bar No. 115364  
ray@boucher.la  
8 Shehnaz M. Bhujwala, Cal. Bar No. 223484  
bhujwala@boucher.la  
9 BOUCHER LLP  
10 21600 W. Oxnard Street Suite 600  
11 Woodland Hills, CA 91367  
12 Tel. (818) 340-5400

13 [Additional counsel listed on signature page]

14 *Attorneys for Plaintiffs*

15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**

17  
18 JANE DOE 1, an individual, et al. ,

19 Plaintiffs,

20 vs.

21 JAIME S. SCHWARTZ, MD, an  
22 individual, et al.,

23 Defendants.

Case No.: 2:25-CV-00898-GW-SSC

**CLASS ACTION**

**STIPULATION REGARDING  
BRIEFING SCHEDULE ON  
MOTION FOR APPOINTMENT OF  
INTERIM CLASS COUNSEL**

[Filed concurrently:  
1. Proposed Order]

1 Plaintiffs Jane Does 1–16 in this action (“Plaintiffs”); Plaintiff Jane Doe 1 in the  
2 action entitled *Jane Doe v. Schwartz, et al.*, Case No. 2:25-cv-02263; Plaintiff Jane  
3 Doe 1 in the action entitled *Jane Doe v. Jaime S. Schwartz MD PC, et al.*, Case No.  
4 2:25-cv-03993; and Plaintiffs in the action entitled *Tuulik, et al. v. Schwartz, et al.*,  
5 Case No. 2:25-cv-04446-DMG-JPR (the four actions together the “Related Actions”),  
6 by and through their undersigned counsel, hereby stipulate and agree as follows.

7 **I. RECITALS**

8 1. The four Related Actions are putative class actions in this District on  
9 behalf of individuals whose confidential information was compromised in the alleged  
10 data breach of Defendants’ computer network.

11 2. The plaintiffs in Case Nos. 2:25-cv-03993 and 2:25-cv-02263 are  
12 represented by Strauss Borrelli PLLC and Daniel Srourian; and plaintiffs in Case No.  
13 2:25-cv-04446 are represented by Haeggquist & Eck LLP

14 3. On May 11, 2025, Plaintiffs filed their Motion to Consolidate and to  
15 Appoint Interim Class Counsel (ECF No. 34) (“Motion to Consolidate and Appoint”).  
16 That Motion was set for hearing on June 12, 2025 at 8:30 a.m. before the Honorable  
17 George H. Wu in Courtroom 9D, and has been continued to June 26, 2025 by  
18 stipulation and order of the Court.

19 4. On June 2, 2025, the parties in each of the Related Actions agreed to  
20 consolidate the Related Actions and have filed a stipulation regarding the same. (*See*  
21 ECF No. 39).

22 5. Counsel for plaintiffs in each of the Related Cases agrees that it is in the  
23 interest of conservation of party resources and judicial economy to agree upon a  
24 briefing schedule concerning Plaintiffs’ request for appointment of class counsel to  
25 avoid the need for multiple competing motions or applications.

26 6. Defendants in the Related Actions have indicated that they do not take a  
27 position on appointment of class counsel.  
28

**II. STIPULATION**

NOW, THEREFORE, the plaintiffs in the Related Actions agree and stipulate as follows, subject to Court approval:

7. Strauss Borrelli and Haeggquist & Eck shall each be permitted to file an Opposition to Plaintiffs' Motion to Consolidate and Appoint on or before June 6, 2025.

8. The Oppositions shall also set forth each firm's arguments in support of their respective requests for appointment as interim class counsel and shall thus be deemed motions for appointment by each of the firms filing those Oppositions.

9. Plaintiffs shall file a combined reply brief to the Oppositions not more than 20 pages in length on or before June 12, 2025.

10. Strauss Borrelli and Haeggquist & Eck shall be permitted to file sur-replies of not more than five (5) pages on or before June 17, 2025.

11. Plaintiffs' Motion to Consolidate and to Appoint Interim Class Counsel (ECF No. 34) shall remain on calendar, solely with respect to appointment of interim lead counsel, on June 26, 2025 at 8:30 a.m. in Courtroom 9D as currently scheduled, although the Parties stipulate and agree that remote attendance shall be permitted, at the Court's discretion, given Strauss Borrelli's inability to travel to the Los Angeles Area on that date due to previously scheduled commitments.

**IT IS SO STIPULATED**

Dated: June 4, 2025

Respectfully submitted,  
ROBINSON MARKEVITCH & PARKER LLP

By: /s/ Damion Robinson  
Damion D. D. Robinson  
David Markevitch  
Jimmie Davis Parker

BOUCHER LLP  
Raymond P. Boucher  
Shehnaz M. Bhujwala

THE LEW FIRM APC  
Charles S. Lew (Cal. Bar No. 227495)  
Isaiah T. Artest (Cal. Bar No. 320326)

- 3 -

1  
2  
3 Dated: June 4, 2025

*Attorneys for Plaintiffs Jane Does 1-16*

Respectfully submitted,  
STRAUSS BORRELLI PLLC

4 By: /s/ Raina C. Borrelli  
5 Carly M. Roman (SBN 349895)  
6 Raina C. Borrelli (*pro hac vice* pending)  
7 STRAUSS BORRELLI PLLC  
8 980 N. Michigan Avenue, Suite 1610  
9 Chicago, IL 60611  
10 Telephone: (872) 263-1100  
11 Facsimile: (872) 263-1109  
12 [croman@straussborrelli.com](mailto:croman@straussborrelli.com)  
13 [raina@straussborrelli.com](mailto:raina@straussborrelli.com)

Daniel Srourian, Esq. (SBN 285678)  
10 **SROURIAN LAW FIRM, P.C.**  
11 468 N. Camden Dr., Suite 200  
12 Beverly Hills, CA 90210  
13 Telephone: (213) 474-3800  
14 Fax: (213) 471-4160  
15 [daniel@slfla.com](mailto:daniel@slfla.com)

*Attorneys for Plaintiff in Case Nos. 2:25-cv-02263 and 2:25-cv-03993*

15 Dated: June 4, 2025

Respectfully submitted,  
HAEGGQUIST & ECK, LLP

16 By: /s/ Aaron M. Olsen  
17 ALREEN HAEGGQUIST (221858)  
18 [alreenh@haelaw.com](mailto:alreenh@haelaw.com)  
19 AARON M. OLSEN (259923)  
20 [aarono@haelaw.com](mailto:aarono@haelaw.com)  
21 ANNA C. SCHWARTZ (346268)  
22 [annas@haelaw.com](mailto:annas@haelaw.com)  
23 225 Broadway, Suite 2050  
24 San Diego, CA 92101  
25 Telephone: (619) 342-8000  
26 Facsimile: (619) 342-7878

*Attorneys for Plaintiff in Case No. 25-cv-00576*

**SIGNATURE ATTESTATION**

I attest pursuant to Local Rule 5-4.3.4(a)(2)(i) that all signatories listed, and on whose behalf this filing is being submitted, concur in the filing's content and have authorized the filing.

Dated: June 4, 2025

/s/ Damion Robinson  
Damion Robinson

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that I filed the foregoing document using the Court's CM/ECF electronic filing platform. I am informed that filing through the CM/ECF Platform results in notice to all interested parties in this action.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed on June 4, 2025 at Los Angeles, California.

\_\_\_\_\_  
[Print Name]

\_\_\_\_\_  
[Signature]